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Attorneys for Archway Broadway
Loan SPE, LLC

UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA
LOS ANGELES DIVISION

In re

SEATON INVESTMENTS, LLC, *et al.*,

Debtors and Debtors-in-
Possession.

Affects:

- ☐ All Debtors
- ☐ Seaton Investments, LLC (*Dismissed*)
- ☐ Colyton Investments, LLC (*Dismissed*)
- ☒ Broadway Avenue Investments, LLC
- ☒ SLA Investments, LLC
- ☒ Negev Investments, LLC
- ☒ Alan Gomperts
- ☒ Daniel Halevy
- ☒ Susan Halevy

Lead Case No. 2:24-bk-12079-VZ

Jointly Administered with Case Nos.:

2:24-bk-12080-VZ; 2:24-bk-12081-VZ;
2:24-bk-12082-VZ; 2:24-bk-12091-VZ;
2:24-bk-12074-VZ; 2:24-bk-12075-VZ; and
2:24-bk-12076-VZ

Chapter 11

**ARCHWAY BROADWAY LOAN SPE, LLC'S
OMNIBUS LIMITED OBJECTION TO:**

**(1) FIRST INTERIM APPLICATION FOR
AWARD OF COMPENSATION AND
REIMBURSEMENT OF EXPENSES OF
SAUL EWING, LLP AS GENERAL
COUNSEL TO INDIVIDUAL DEBTORS AND
DEBTORS-IN-POSSESSION (Dkt. 555); and**

**(2) FIRST INTERIM APPLICATION OF
WEINTRAUB ZOLKIN TALERICO &
SELTH LLP FOR APPROVAL OF
COMPENSATION AND REIMBURSEMENT
OF EXPENSES (Dkt. 556)**

Date: September 25, 2025

Time: 11:00 a.m.

Ctrm.: 1368

255 E. Temple Street

Los Angeles, CA 90012

Hon. Vincent P. Zurzolo

FRANDZEL ROBINS BLOOM & CSATO, L.C.
1000 WILSHIRE BOULEVARD, NINETEENTH FLOOR
LOS ANGELES, CALIFORNIA 90017-2427
(323) 852-1000

LIMITED OBJECTION¹

Archway doesn't oppose allowance of the amounts sought in the Fee Applications. But it objects and requests adequate protection to the extent the Fee Applicants seek payment sourced from Archway's cash collateral.²

DATED: September 11, 2025

FRANDZEL ROBINS BLOOM & CSATO, L.C.

By: /s/ Gerrick M. Warrington

GERRICK M. WARRINGTON

Attorneys for Archway Broadway Loan SPE, LLC

¹ Archway Broadway Loan SPE, LLC, a Delaware limited liability company, successor in interest to Archway Real Estate Income Fund I REIT, LLC ("Archway"), submits this Omnibus Limited Objection ("Limited Objection") to the *First Interim Application for Award of Compensation and Reimbursement of Expenses of Saul Ewing, LLP as General Counsel to Individual Debtors and Debtors-in-Possession* (Dkt. 555) ("Saul Ewing Fee Application") and the *First Interim Application of Weintraub Zolkin Talerico & Selth LLP for Approval of Compensation and Reimbursement of Expenses* (Dkt. 556) ("Weintraub Fee Application" and together, the "Fee Applications") filed by the applicants ("Applicants") in the lead case of Seaton Investments, LLC ("Seaton") (dismissed), Colyton Investments, LLC ("Colyton") (dismissed), Broadway Avenue Investments, LLC ("Broadway"), SLA Investments, LLC ("SLA"), and Negev Investments, LLC ("Negev" and collectively with Seaton, Colyton, Broadway and SLA, the "Corporate Debtors") and Alan Gomperts ("Mr. Gomperts"), Daniel Halevy ("Mr. Halevy"), and Susan Halevy ("Ms. Halevy" and collectively with Mr. Gomperts and Mr. Halevy, the "Individual Debtors" and collectively with the Corporate Debtors, the "Debtors" and excluding Seaton and Colyton, the "Remaining Debtors").

² Archway's cash collateral includes rents, cash, accounts, general intangibles, existing or after-acquired and proceeds thereof, as evidenced by its loan documents, recorded deeds of trust, recorded assignments of rents, security agreements and UCC-1 financing statements. *See, generally*, Archway Proofs of Claim (2:24-bk-12081-VZ Broadway Avenue Investments, LLC Claim 2), (2:24-bk-12091-VZ Negev Investments, LLC Claim 2), (2:24-bk-12082-VZ SLA Investments, LLC Claim 2), (2:24-bk-12074-VZ Alan Gomperts Claims 7–9), (2:24-bk-12076-VZ Susan Halevy Claims 4–6), and (2:24-bk-12075-VZ Daniel Halevy Claims 6–8).

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is 1000 Wilshire Boulevard, Nineteenth Floor, Los Angeles, CA 90017-2427.

A true and correct copy of the foregoing document entitled (*specify*):

ARCHWAY BROADWAY LOAN SPE, LLC'S OMNIBUS LIMITED OBJECTION TO: (1) FIRST INTERIM APPLICATION FOR AWARD OF COMPENSATION AND REIMBURSEMENT OF EXPENSES OF SAUL EWING, LLP AS GENERAL COUNSEL TO INDIVIDUAL DEBTORS AND DEBTORS-IN-POSSESSION (Dkt. 555); and (2) FIRST INTERIM APPLICATION OF WEINTRAUB ZOLKIN TALERICO & SELTH LLP FOR APPROVAL OF COMPENSATION AND REIMBURSEMENT OF EXPENSES (Dkt. 556)

will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) September 11, 2025, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

- Counsel to Party in Interest: Scott R Albrecht salbrecht@gsaattorneys.com, jackie.nguyen@sgsattorneys.com
- Counsel to KDM: Tanya Behnam tbehnam@polsinelli.com, tanyabehnam@gmail.com;ccripe@polsinelli.com;laddocketing@polsinelli.com
- Counsel to Party in Interest: Jacquelyn H Choi jacquelyn.choi@rimonlaw.com, docketingsupport@rimonlaw.com
- Counsel to Individual Debtors: Carol Chow Carol.Chow@saul.com, easter.santamaria@saul.com
- Counsel to Party in Interest: Robert F Conte robert.conte@usdoj.gov, caseview.ecf@usdoj.gov;usacac.tax@usdoj.gov
- Counsel to Individual Debtors: Ryan Coy ryan.coy@saul.com, hannah.richmond@saul.com
- Counsel to Party in Interest: Christopher Cramer secured@becket-lee.com
- Counsel to Individual Debtors: Turner Falk turner.falk@saul.com, tnfalk@recap.email
- Counsel to Archway: Michael G Fletcher mfletcher@frandzel.com, sking@frandzel.com
- Counsel to Party in Interest: Todd S. Garan ch11ecf@aldridgepите.com, TSG@ecf.inforuptcy.com;tgaran@aldridgepите.com
- Counsel to Party in Interest: Richard Girgado rgirgado@counsel.lacounty.gov
- Counsel to Party in Interest: Jacqueline L James jjames@hrhlaw.com
- Trial Counsel to U.S. Trustee: Kelly L Morrison kelly.l.morrison@usdoj.gov
- Counsel to Party in Interest: Avi Edward Muhtar amuhtar@crowndandstonelaw.com
- Counsel to Archway: Bruce D Poltrock bpoltrock@frandzel.com, achase@frandzel.com
- Counsel to Individual Debtors: Zev Shechtman Zev.Shechtman@saul.com, zshechtman@ecf.inforuptcy.com;hannah.richmond@saul.com
- Counsel to Corporate Debtors: Derrick Talerico dtalerico@wztslaw.com, maraki@wztslaw.com,sfritz@wztslaw.com,admin@wztslaw.com
- United States Trustee (LA) ustpreion16.la.ecf@usdoj.gov
- Counsel to Archway: Gerrick Warrington gwarrington@frandzel.com, achase@frandzel.com
- Counsel to Party in Interest: Jennifer C Wong bknotice@mccarthyholthus.com, jwong@ecf.courtdrive.com

☐ Service information continued on attached page.

2. SERVED BY UNITED STATES MAIL:

On (*date*) _____, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page.

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (date) September 11, 2025, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

Overnight Delivery (Early Morning):

The Honorable Vincent P. Zurzolo
U.S. Bankruptcy Court
Roybal Federal Building
Bin outside of Suite 1360
255 E. Temple Street
Los Angeles, CA 90012-3332

Email:

Counsel to Corporate Debtors:

Derrick Talerico dtalerico@wztslaw.com

Counsel to Individual Debtors:

Zev Shechtman Zev.Shechtman@saul.com

Turner Falk turner.falk@saul.com

Ryan Coy ryan.coy@saul.com

United States Trustee:

Kelly L Morrison kelly.l.morrison@usdoj.gov

☐ Service information continued on attached page.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

September 11, 2025

Date

Annette Chase

Printed Name

/s/ Annette Chase

Signature